



Your business  
is our business.

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June 3, 2014

**VIA Electronic Comment Filing System**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42  
2014 ETC Annual Report of CGKC&H #1 L.P. Five Star Wireless  
Study Area Code 449046**

Dear Ms. Dortch:

On behalf of CGKC&H #1 L.P. Five Star Wireless, JSI files the attached FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.<sup>1</sup>

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall  
JSI Vice President  
301-459-7590  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

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<sup>1</sup> 47 C.F.R. §§ 54.313, 54.422.

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**

 FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

<010> Study Area Code	449046
<015> Study Area Name	CGKC&H #1 L. P. FIVE STAR WIRELESS
<020> Program Year	2015
<030> Contact Name: Person USAC should contact with questions about this data	Charlotte Foltz Crawford
<035> Contact Telephone Number: Number of the person identified in data line <030>	3259449016 ext.6100
<039> Contact Email Address: Email of the person identified in data line <030>	cfoltz@wcc.net

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
(check box when complete)			
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> <div style="border: 1px solid black; padding: 2px;">449046TX510.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> <div style="border: 1px solid black; padding: 2px;">449046TX610.pdf</div>	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(100) Service Quality Improvement Reporting  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	449046
<015>	Study Area Name	CGKC&H #1 L. P. FIVE STAR WIRELESS
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Charlotte Poltz Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	3259449016 ext. 6100
<039>	Contact Email Address - Email Address of person identified in data line <030>	cpoltz@wcc.net
<110>	Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	<div><div><input checked="" type="radio"/></div><div>(yes / no)</div></div> <div><div><input type="radio"/></div><div>(yes / no)</div></div>
<111>		

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

Name of Attached Document

Please check these boxes below to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets	<div></div>
<114>	Report how much universal service (USF) support was received	<div></div>
<115>	How (USF) was used to improve service quality	<div></div>
<116>	How (USF) was used to improve service coverage	<div></div>
<117>	How (USF) was used to improve service capacity	<div></div>
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.	<div></div>

[illegible]







<b>(900) Tribal Lands Reporting Data Collection Form</b>		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	
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<010>	Study Area Code	449046
<015>	Study Area Name	CGKC&H #1 L. P. FIVE STAR WIRELESS
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Charlotte Poltz Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	3259449016 ext.6100
<039>	Contact Email Address - Email Address of person identified in data line <030>	cfoltz@wcc.net

<910>	Tribal Land(s) on which ETC Serves
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<920>	Tribal Government Engagement Obligation
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Name of Attached Document

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

<921>	Needs assessment and deployment planning with a focus on Tribal community anchor institutions.	Select (Yes,No, NA)
<922>	Feasibility and sustainability planning;	
<923>	Marketing services in a culturally sensitive manner;	
<924>	Compliance with Rights of way processes	
<925>	Compliance with Land Use permitting requirements	
<926>	Compliance with Facilities Siting rules	
<927>	Compliance with Environmental Review processes	
<928>	Compliance with Cultural Preservation review processes	
<929>	Compliance with Tribal Business and Licensing requirements.	



(1100) No Terrestrial Backhaul Reporting

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	449046
<015>	Study Area Name	CGKC&H #1 L. P. FIVE STAR WIRELESS
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Charlotte Foltz Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	3259449016 ext. 6100
<039>	Contact Email Address - Email Address of person identified in data line <030>	cfoltz@wcc.net

☐

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)

☐

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)

<b>(1200) Terms and Condition for Lifeline Customers</b>		FCC Form 481
<b>Lifeline</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
<b>Data Collection Form</b>		July 2013

<010>	Study Area Code	449046
<015>	Study Area Name	CGRC&H #1 L. P. FIVE STAR WIRELESS
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Charlotte Foltz Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	3259449016 ext. 6100
<039>	Contact Email Address - Email Address of person identified in data line <030>	cfoltz@wcc.net

<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	<div>449046TX1210.pdf</div>	Name of Attached Document
<1220>	Link to Public Website	HTTP	

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<010>	Study Area Code	449046
<015>	Study Area Name	CGKC&H #1 L. P. FIVE STAR WIRELESS
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Charlotte Foltz Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	3259449016 ext. 6100
<039>	Contact Email Address - Email Address of person identified in data line <030>	cfoltz@wcc.net

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting		
<2010>	2nd Year Certification {47 CFR § 54.313(b)(1)}	<input type="checkbox"/>
<2011>	3rd Year Certification {47 CFR § 54.313(b)(2)}	<input type="checkbox"/>
Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}		
<2012>	2013 Frozen Support Certification	<input type="checkbox"/>
<2013>	2014 Frozen Support Certification	<input type="checkbox"/>
<2014>	2015 Frozen Support Certification	<input type="checkbox"/>
<2015>	2016 and future Frozen Support Certification	<input type="checkbox"/>
Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}		
<2016>	Certification Support Used to Build Broadband	<input type="checkbox"/>
Connect America Phase II Reporting {47 CFR § 54.313(e)}		
<2017>	3rd year Broadband Service Certification	<input type="checkbox"/>
<2018>	5th year Broadband Service Certification	<input type="checkbox"/>
<2019>	Interim Progress Certification	<input type="checkbox"/>
<2020>	Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	

<2021>	Interim Progress Community Anchor Institutions	<div></div>
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Name of Attached Document Listing Required Information

<b>(3000) Rate Of Return Carrier Additional Documentation</b>		FCC Form 481
<b>Data Collection Form</b>		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

<010>	Study Area Code	449046
<015>	Study Area Name	CGK&H #1 L. P. FIVE STAR WIRELESS
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Charlottesville Police Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	3259449016 ext. 6100
<039>	Contact Email Address - Email Address of person identified in data line <030>	cfoltz@wsc.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010)	Progress Report on 5 Year Plan	
	Milestone Certification (47 CFR § 54.313(f)(1)(ii))	

(3011)	Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<input type="checkbox"/>
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(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii))	
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(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))	<input type="checkbox"/>
(3014)	If yes, does your company file the RUS annual report	<input type="checkbox"/>

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<input type="checkbox"/>
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>

(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	
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(3018)	If the response is no on line 3014, Is your company audited?	<input type="checkbox"/>
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If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications	<input type="checkbox"/>
--------	---	--------------------------

(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>
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(3021)	Management letter issued by the independent certified public accountant that performed the company's financial audit.	<input type="checkbox"/>
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If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,	<input type="checkbox"/>
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(3023)	Underlying information subjected to a review by an independent certified public accountant	<input type="checkbox"/>
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(3024)	Underlying information subjected to an officer certification.	<input type="checkbox"/>
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(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>
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(3026)	Attach the worksheet listing required information	
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Name of Attached Document Listing Required Information

<b>Certification - Reporting Carrier Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	449046
<015>	Study Area Name	CGKC&H #1 L. P. FIVE STAR WIRELESS
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Charlotte Foltz Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	3259449016 ext. 6100
<039>	Contact Email Address - Email Address of person identified in data line <030>	cfoltz@wcc.net

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

<b>Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients</b>	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier  
Data Collection Form**

 FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

<010> Study Area Code	449046
<015> Study Area Name	CGKC&H #1 L. P. FIVE STAR WIRELESS
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Charlotte Foltz Crawford
<035> Contact Telephone Number - Number of person identified in data line <030>	3259449016 ext.6100
<039> Contact Email Address - Email Address of person identified in data line <030>	cfoltz@wcc.net

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>Wes Robinson</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	<u>Wes Robinson</u>
Name of Reporting Carrier:	<u>CGKC&amp;H #1 L. P. FIVE STAR WIRELESS</u>
Signature of Authorized Officer:	<u>CERTIFIED ONLINE</u> Date: <u>05/30/2014</u>
Printed name of Authorized Officer:	<u>Charlotte Crawford</u>
Title or position of Authorized Officer:	<u>Controller</u>
Telephone number of Authorized Officer:	<u>3259449016 ext.6100</u>
Study Area Code of Reporting Carrier:	<u>449046</u> Filing Due Date for this form: <u>06/30/2014</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	<u>CGKC&amp;H #1 L. P. FIVE STAR WIRELESS</u>
Name of Authorized Agent or Employee of Agent:	<u>Wes Robinson</u>
Signature of Authorized Agent or Employee of Agent:	<u>CERTIFIED ONLINE</u> Date: <u>05/30/2014</u>
Printed name of Authorized Agent or Employee of Agent:	<u>Wes Robinson</u>
Title or position of Authorized Agent or Employee of Agent:	<u>Manager - Regulatory Affairs</u>
Telephone number of Authorized Agent or Employee of Agent:	<u>5123380473 ext.226</u>
Study Area Code of Reporting Carrier:	<u>449046</u> Filing Due Date for this form: <u>06/30/2014</u>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	449046
<015>	Study Area Name	CGKC&H #1 L. P. FIVE STAR WIRELESS
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Charlotte Poltz Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	3259449016 ext.6100
<039>	Contact Email Address - Email Address of person identified in data line <030>	cpoltz@gcc.net

1/1/2014	36.3
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	Residential Local Service Charge Effective Date
<701>	Single State-wide Residential Local Service Charge
<702>	

<703>

[illegible]



(710) Broadband Price Offerings  
Data Collection Form

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	449046
<015>	Study Area Name	CGKC&H #1 L. P. FIVE STAR WIRELESS
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Charlotte Poltz Crawford
<035>	Contact Telephone Number - Number of person identified in data line <030>	3259449016 ext. 6100
<039>	Contact Email Address - Email Address of person identified in data line <030>	cpoltz@wbcc.net

[illegible]



**Texas RSA 15B2 Rural Cellular, LP**

**Study Area Code: 449046**

**Response to Line 510 - Service Quality Standards and Consumer Protection Rules**

**Compliance**

In establishing this certification in its *2005 ETC Order*,<sup>1</sup> the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”<sup>2</sup> The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement and that the sufficiency of other commitments would be considered on a case-by-case basis.<sup>3</sup> In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”<sup>4</sup>

Texas RSA 15B2 Rural Cellular, LP (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company complies with the Cellular Telecommunications Industry Association Consumer Code for Wireless Service (“CTIA Code”) as attached and does business as West Central Wireless.

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<sup>1</sup> *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

<sup>2</sup> *Id.* at para. 28.

<sup>3</sup> *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

<sup>4</sup> *Id.* at n. 72.

West Central Wireless adheres to 11 points within the CTIA Consumer Code, including disclosing rates, additional taxes, fees, surcharges and terms of service; providing coverage maps; making customer service readily accessible; and allowing a trial period for new service.

**1. WEST CENTRAL WIRELESS DISCLOSES RATES AND TERMS OF SERVICE TO CONSUMERS**

For each service plan offered to new consumers, West Central Wireless discloses to consumers at point of sale and on its web sites, at least the following information, as applicable: (a) the coverage area for the service; (b) any activation or initiation fee; (c) the monthly access fee or base charge; (d) the amount and nature of any voice, messaging, or data allowances included in the plan (such as night and weekend minutes); (e) the charges for domestic usage in excess of any included allowances or outside of the coverage area; (f) for prepaid service plans, the period of time during which any balance is available for use; (g) whether there are prohibitions on data service usage and whether there are network management practices that will have a material impact on the customer's wireless data experience; (h) whether any additional taxes, fees or surcharges apply; (i) the amount or range of any such fees or surcharges that are collected and retained by the carrier; (j) the amount or nature of any late payment fee; (k) whether a fixed-term contract is required and its duration; (l) the amount and nature of any early termination fee that may apply; and (m) the trial period during which a consumer may cancel service without any early termination fee, as long as the consumer complies with any applicable return policy.

**2. WEST CENTRAL WIRELESS MAKES AVAILABLE MAPS SHOWING WHERE SERVICE IS GENERALLY AVAILABLE**

West Central Wireless makes available at point of sale and on its web sites maps depicting approximate domestic coverage applicable to each of their service plans currently offered to consumers. To enable consumers to make comparisons among carriers, West Central Wireless generated this map using generally accepted methodologies and standards to depict outdoor coverage. All such maps will contain or link to an appropriate legend concerning limitations and/or variations in wireless coverage and map usage, including any geographic limitations on the availability of any services included in the plan. West Central Wireless periodically updates such maps as necessary to keep them reasonably current. If necessary to show the extent of service coverage available to customers from carriers' roaming partners, West Central Wireless incorporates coverage maps from roaming partners that are generated using similar industry-accepted criteria, or if such information is not available, incorporate publicly available information regarding roaming partners' coverage areas.

**3. WEST CENTRAL WIRELESS PROVIDES CONTRACT TERMS TO CUSTOMERS AND CONFIRMS CHANGES IN SERVICE**

When a customer initiates new service or a change in existing service, West Central Wireless provides or confirms any new material terms and conditions of the ongoing service with the customer.

**4. WEST CENTRAL WIRELESS ALLOWS A TRIAL PERIOD FOR NEW SERVICE**

When a customer initiates postpaid service with West Central Wireless, the customer will be informed of and given a period of not less than 14 days to try out the service. West Central Wireless does not impose an early termination fee if the customer cancels service within this period, provided that the customer complies with applicable return and/or exchange policies. Other charges, including usage charges, may still apply.

**5. WEST CENTRAL WIRELESS PROVIDES SPECIFIC DISCLOSURES IN ADVERTISING**

In advertising of prices for wireless service plans or devices, West Central Wireless discloses material charges and conditions related to the advertised prices and services, including if applicable and to the extent the advertising medium reasonably allows: (a) whether activation or initiation fees apply; (b) monthly access fees or base charges; (c) the amount and nature of any voice, messaging, or data service allowances included in the plan; (d) the charges for any domestic usage in excess of any included allowances or outside of the coverage area; (e) for prepaid service plans, the period of time during which any balance is available for use; (f) whether there are network management practices that will have a material impact on the customer's wireless data experience; (g) whether any additional taxes, fees or surcharges apply; (h) the amount or range of any such fees or surcharges that are collected and retained by the carrier; (i) whether a fixed-term contract is required and its duration; (j) early termination fees; (k) the terms and conditions related to receiving a product or service for "free;" (l) for any service plan advertised as "nationwide," (or using similar terms), the carrier will have available substantiation for this claim; and (i) whether prices or benefits apply only for a limited time or promotional period and, if so, whether any different fees or charges will apply for the remainder of the contract term.

**6. WEST CENTRAL WIRELESS SEPARATELY IDENTIFIES CARRIER CHARGES FROM TAXES ON BILLING STATEMENTS**

On customers' bills, West Central Wireless distinguishes (a) monthly charges for service and features, and other Charges collected and retained by West Central Wireless, from (b) taxes, fees and other charges collected by West Central Wireless and remitted to federal state or local governments. West Central Wireless will not label cost recovery fees or charges as taxes.

**7. WEST CENTRAL WIRELESS PROVIDES CUSTOMERS THE RIGHT TO TERMINATE SERVICE FOR CHANGES TO CONTRACT TERMS**

West Central Wireless will not modify the material terms of their postpaid customers' contracts in a manner that is materially adverse to those customers without providing a reasonable advance notice of a proposed modification and allowing those customers a time period of not less than 14 days to cancel their contracts with no early termination fee.

**8. WEST CENTRAL WIRELESS PROVIDES READY ACCESS TO CUSTOMER SERVICE**

Customers will be provided a toll-free telephone number to access West Central Wireless' customer service during normal business hours. Customer service contact information will be provided to customers online and on billing statements. West Central Wireless provides information about how customers can contact the carrier in writing, by toll-free telephone number, via the Internet or otherwise with any inquiries or complaints, and this information is included, at a minimum, on all billing statements, in written responses to customer inquiries and on West Central Wireless' web

sites. West Central Wireless also makes such contact information available, upon request, to any customer calling customer service departments.

**9. WEST CENTRAL WIRELESS PROMPTLY RESPONDS TO CONSUMER INQUIRIES AND COMPLAINTS RECEIVED FROM GOVERNMENT AGENCIES**

West Central Wireless responds in writing to state or federal administrative agencies within 30 days of receiving written consumer complaints from any such agency.

**10. WEST CENTRAL WIRELESS ABIDES BY POLICIES FOR PROTECTION OF CUSTOMER PRIVACY**

West Central Wireless abides by a policy regarding the privacy of customer information in accordance with applicable federal and state laws, and makes available to the public its privacy policy concerning information collected online. West Central Wireless abides by the CTIA Best Practices and Guidelines or Location-Based Services.

**11. WEST CENTRAL WIRELESS PROVIDES CONSUMERS WITH FREE NOTIFICATIONS FOR VOICE, DATA AND MESSAGING USAGE, AND INTERNATIONAL ROAMING**

West Central Wireless provides, at no charge: (a) a notification to consumers of currently-offered and future domestic wireless plans that include limited data allowances when consumers approach and exceed their allowance for data usage and will incur overage charges; (b) a notification to consumers of currently-offered and future domestic voice and messaging plans that include limited voice and messaging allowances when consumers approach and exceed their allowance for those services and will incur overage charges; and (c) a notification to consumers without an international roaming plan/package whose devices have registered abroad and who may incur charges for international usage. West Central Wireless generates the notifications described above to postpaid consumers based on information available at the time the notification is sent. Wireless consumers will not have to affirmatively sign up in order for these notifications to be sent. West Central Wireless clearly and conspicuously discloses tools or services that enable consumers to track, monitor and/or set limits on voice, messaging and data usage.

**Texas RSA 15B2 Rural Cellular, LP**

**Study Area Code: 449046**

**Response to Line 610 - Ability to Function in Emergency Situations**

Texas RSA 15B2 Rural Cellular, LP (“Company”) hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2).<sup>1</sup> The Company’s network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations also allows the Company to manage traffic spikes throughout its network, as emergency situations require.

The Company’s network is homed back to a central switching center that is fully supported by automated emergency back-up generators. The connecting trunking and signaling circuits are also on a diverse route to avoid prolonged outages. The Company’s tower sites have one to eight hours of battery back-up and strategic sites have emergency generators. If necessary, in emergency situations, the company can deploy portable or temporary cellular base stations.

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<sup>1</sup> Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”

## **Texas RSA 15B2 Rural Cellular, LP**

### **Rates, Terms and Conditions for Lifeline Service**

**(Response to Form 481, Line 1210)**

Texas RSA 15B2 Rural Cellular, LP d/b/a West Central Wireless, Right Wireless and Five Star Wireless offers Lifeline discounts on all rate plans that include voice services to eligible customers. Currently available rate plans are as specified in the attached brochure. The Company has been designated as an ETC in both rural and non-rural Incumbent Local Exchange Company service areas and, due to reforms associated with state universal service support, the Company's Lifeline discounts vary by ILEC service territory.

<u>ILEC Service Area</u>	<u>Total Lifeline Discount</u> <sup>(1)</sup>
Verizon	\$ 15.70
Windstream – Kerrville	\$ 14.40

<sup>(1)</sup> Qualified Lifeline customers are eligible for Lifeline credits or discounts as outlined in the attached Lifeline tariff.





# Personal Rate Plans

## Family Plans

### Voice + Text

Monthly Charge (first 2 lines)	\$84.95
Home/Nationwide Mins.	Unlimited/1250
Home/Nationwide Data	See Data Options
Voice Only Partner	\$9.95
Texting	Unlimited
Picture Messaging	See Messaging Options

### Voice + Data

Monthly Charge (first 2 lines)	\$114.99
Home/Nationwide Mins.	Unlimited/1000
Home/Nationwide Data	8 GB/480 MB
Voice Only Partner	\$9.99
Voice + Data Partners*	\$29.98
*Partner Data adds 2 GB Home/60 MB Nationwide to Family Plan	
Unlimited Texting & Picture Messaging	\$20 per Family

Applies to all Family Plans

Nationwide minutes are shared between all lines. Plan includes Voicemail and Caller ID for all lines. Add up to 3 partner lines, 5 total. Airtime Overages = \$.20 per minute.  
Data Overages: \$20 for 1 GB Home Data, \$20 for 80 MB Nationwide Data

## Individual Voice + Data Plans

Anytime Minutes	Monthly Charge	Nationwide Minutes	Unlimited Text/Picture Messaging	Home/Nationwide Data
500	\$49.99	200	\$10.00	1 GB/60 MB
Unlimited	\$59.99	450	\$10.00	4 GB/240 MB

Plans include unlimited Night/Weekend minutes, Voicemail, Caller ID, and unlimited Mobile-to-Mobile minutes.  
Airtime Overages - \$.20 per minute, Data Overages: \$20 for 1 GB Home Data, \$20 for 80 MB Nationwide Data

## Simply Better Plans

### National

Anytime Minutes	Monthly Charge	Partner Line (up to 4 lines)	Nights/Weekends	Texting
400	\$35.00	\$15.00	400/400	See Messaging Options
1000	\$50.00*	\$10.00	Unlimited	See Messaging Options
1500	\$75.00*	\$15.00	Unlimited	Unlimited

### Home

Anytime Minutes	Monthly Charge	Partner Line (up to 4 lines)	Nights/Weekends	Nationwide Minutes	Texting
800	\$35.00	\$15.00	800/800	50	See Messaging Options
1500	\$50.00*	\$10.00	Unlimited	100	See Messaging Options
2000	\$75.00*	\$15.00	Unlimited	200	Unlimited

\*Plan includes Voicemail and Caller ID.

All plans include unlimited Mobile-to-Mobile minutes.

See data options to add a data plan. Simply Better Plans can have up to 4 partner lines.

Simply Better Plan Overages: \$35 = \$.40 per minute, \$50 = \$.30 per minute, \$75 = \$.25 per minute

## Pay Your Age Plan

Monthly Charge	\$7.00-\$17.00
Anytime Minutes	200
Night Minutes	200
Weekend Minutes	200
Texting	Unlimited

Requires one existing WCW phone of \$35 or more and plan will only pool with Simply Better \$35, Individual Voice+Data \$49.99, and Senior Plans. Anytime minutes will be Home Area or Nationwide according to the main line. Overages Home = \$.40 per minute, Nationwide Roaming = \$.60 per minute

## Senior Plans

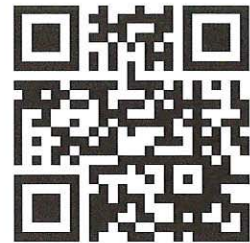
Monthly Charge	Anytime Minutes*	Night Minutes	Weekend Minutes
\$17.00	30	30	30
\$22.00	100	100	100
\$25.00	200	200	200

\*Anytime minutes are Nationwide.

Airtime Overages = \$.40 per minute

Terms and Conditions: All Night/Weekend and Mobile-to-Mobile minutes are restricted to the Home Area and phone must display "West Central Wireless." All plans include unlimited incoming texts, E-bill option is free. There is a \$3 charge for printed bills on all plans. Anytime Minutes: 7 am to 8 pm, Night Minutes: 8 pm to 7 am, Weekend Minutes: 8 pm Friday - 7 am Monday Mobile-to-Mobile Minutes: only calls between WCW phones in the home area. WCW reserves the right to change the rate plan or refuse any further service if 50% or more of the usage is used outside of the WCW 26-county home area. Two year contracts required with phone purchase. A \$20 processing fee applies on upgrades and new activations. Pricing does not include taxes, surcharges, and fees. See [www.westcentral.com](http://www.westcentral.com) for more details.





Scan to go to  
WestCentral.com

*It's been my pleasure  
serving you today!*

Home Office  
3389 Knickerbocker Rd.  
San Angelo, TX

For additional locations and business hours,  
contact customer care or visit our website:

[www.WestCentral.com](http://www.WestCentral.com)  
[info@wcc.net](mailto:info@wcc.net)  
(800) 695-9016

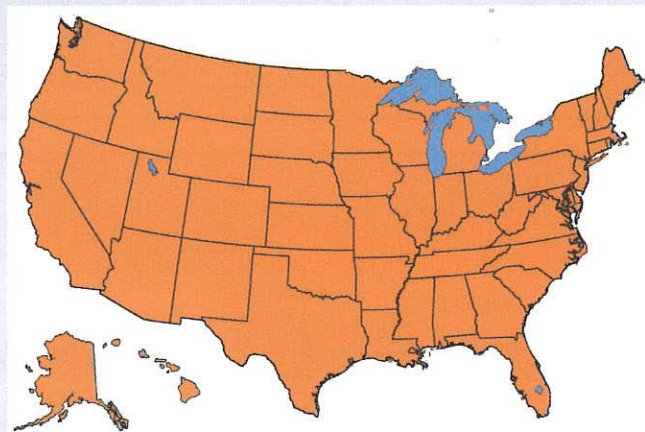
My Name is: \_\_\_\_\_

My Location is: \_\_\_\_\_

## Home Area Coverage



## National Coverage



## Data Options

Home Data/Nationwide Data	Price (per month)
300 MB/Wi-Fi	\$14.99
1 GB/120 MB	\$19.99
3 GB/210 MB	\$29.99
6 GB/300 MB	\$49.99

Overages Home: 1 GB for \$20, Nationwide: 80 MB for \$20

## Messaging Options

Feature	Price (per month)
Unlimited Texts	\$12.00
1000 Texts	\$8.00
500 Texts	\$5.00
Unlimited Pictures	\$8.00
40 Pictures	\$5.00
Unlimited Text and Pictures	\$18.00

Pay-per-use Texts = \$.10 each

Pay-per-use Pictures = \$.25 each

## Additional Features

Feature	Price (per month)
Voice Mail*	\$2.00-\$3.99
Caller ID	\$1.95
Roadside Assistance	\$2.45
7pm Night & Weekend	\$2.95
Wireless Equipment Protection**	\$3.95 or \$5.95

\* Price based on features selected: Basic or Voicemail to Email and Web.

\*\*Depends on phone selection



# Flexible Choice

## Step 1: Choose Your Data Plan

Home Data	Monthly Charge	Nationwide Data
500 MB	\$20	240 MB
2 GB	\$50	240 MB
4 GB	\$65	480 MB
6 GB	\$80	480 MB
12 GB	\$100	480 MB
24 GB	\$150	1 GB
48 GB	\$300	1 GB

Plans include unlimited minute in home area, Voicemail and Caller ID.  
Airtime Overages - \$.12 per minute.  
Data Overages: \$12 for 1 GB Home Data, \$12 for 40 MB Nationwide Data.

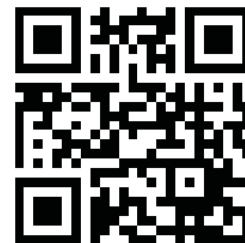
## Step 2: Choose Your Flexible Choice Program

### Individual Voice + Data Plans

Anytime Minutes	Monthly Charge	Nationwide Minutes	Unlimited Text & Picture Messaging
Unlimited	\$12 - \$24	500	Included

\$12 per month applies to lines with no contract or lease agreement \$24 per month applies to lines with a contract.

Terms and Conditions: Unlimited minutes are restricted to the Home Area and phone must display "West Central Wireless." All plans include unlimited incoming texts, E-bill option is free. There is a \$3 charge for printed bills on all plans. WCW reserves the right to change the rate plan or refuse any further service if 50% or more of the usage is used outside of the WCW 26-county home area. Two year contract or Lease Agreement required with phone purchase. A \$20 processing fee applies on upgrades and new activations. Pricing does not include taxes, surcharges, and fees. See [www.westcentral.com](http://www.westcentral.com) for more details.



*It's been my pleasure  
serving you today!*

Home Office  
3389 Knickerbocker Rd.  
San Angelo, TX

www.WestCentral.com  
info@wcc.net  
(800) 695-9016

My Location is:

## National Coverage



## Additional Features

Feature	Price (per month)
Voice Mail, Email & Web	\$2.00
Roadside Assistance	\$2.45
7pm Night & Weekend	\$2.95
Wireless Equipment Repair & Replacement*	\$6.00, \$8.00 or \$10.00
Wireless Equipment Repair**	\$5.00

\*\*Repair Fee \$35 per incident. One LCD replacement per year. All other incidents unlimited



## LIFELINE PROGRAM

### I. LIFELINE PROGRAM

#### General

- A. Lifeline Service is a retail local service offering sponsored by the FCC and available to qualifying low-income consumers in accordance with the Public Utility Commission of Texas' Subst. R. 26.412.
1. Consumers qualifying for Lifeline Service are offered the services or functionalities enumerated in 47 Code of Federal Regulations §54.101(a)(1)-(8) (relating to Supported Services for Rural, Insular and High Cost Areas).
  2. The Company shall offer Toll Denial at no charge to all qualifying low-income consumers at the time such consumers subscribe to Lifeline Service.
  3. A customer otherwise eligible to receive the Lifeline Service shall not be prohibited from obtaining and using telecommunication equipment and services designed to aid such customer in utilizing qualifying telecommunication services.
  4. Lifeline Service rate reductions only apply to basic service and do not apply to long distance service, 976 and other information provider services, or any other optional services or functionalities (i.e., custom calling features, construction, etc.) which may or may not be tariffed. Customers may obtain such services, where available, at their discretion, although the Lifeline Service reduction does not apply.
  5. The Lifeline Service rate reductions do not apply to service connection charges.
  6. Lifeline Service will not be available on a retroactive basis.

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Issued: October 9, 2013

Effective: October 10, 2013

Mike Higgins  
P.O. Box 991  
San Angelo, Texas 76902

**LIFELINE PROGRAM**

**I. LIFELINE PROGRAM (Cont'd)**

**B. Eligibility Requirements**

1. The discounted service will be provided for one (1) residential telephone line per household, at the subscriber's principal place of residence.
2. The service must be provided in the eligible consumer's name.
3. The applicant must participate in, or have a person or child who resides in the customer household who participates in, one of the following programs or can certify that their annual income is at or below 150% of the federal poverty guidelines
  - Medicaid
  - Food Stamps
  - Low-income Home Energy Assistance Programs (HEAP)
  - Supplemental Security Income (SSI)
  - Federal public housing assistance
  - State Child Health Plan
4. Procedures for Establishing Lifeline Discounts
  - (a) The Texas Low Income Discount Administrator (LIDA) identifies customers who are eligible for Lifeline Service discounts and will provide a monthly list to the Company. The Company will apply the discounts unless the Company receives a customer request to be excluded from such discounts.
  - (b) Consumers who do not participate in one of the designated programs but who meet income qualifications by having an annual income at or below 150% of the federal poverty guidelines, may establish self-enrollment eligibility for Lifeline Service by contacting the LIDA and receive Lifeline Service discounts within 30 days of proof of eligibility.

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## LIFELINE PROGRAM

### I. LIFELINE PROGRAM (Cont'd)

#### B. Eligibility Requirements (Cont'd)

##### 5. Provision of Service

- (a) The Company shall provide Lifeline Service to all eligible consumers served by the Company where identified by the LIDA. Within 30 days after receipt of the list or receipt of customer affidavit, the Company shall begin reduced billing for those eligible low-income consumers. For self-enrolled customers, the discount is available for seven months, including a 60-day period for renewing eligibility with LIDA.
- (b) If the eligible consumer changes the telephone service to qualifying services or initiates new qualifying service, the Company shall begin reduced billing at the time the change of service becomes effective or when the new service is established.
- (c) The Company will discontinue Lifeline Service discounts upon notice by LIDA that a customer is no longer eligible.
- (d) The Company has provided a confidentiality agreement to the LIDA specifying the use of confidential client information is solely for providing Lifeline Service.

#### C. Deposits

The deposit requirements will be waived for Lifeline Service applicants who voluntarily elect to subscribe to Toll Denial Service. If TDS is not subscribed, a deposit may be required of the applicant.

#### D. Lifeline Service Discounts

Eligible consumers who subscribe to Lifeline Service will receive the following:

- (1) Federal support amount of \$9.25 per month or equal to the support amount directed by the Federal Communications Commission in Chapter 47 Code of Federal Regulations regarding Lifeline support.

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**LIFELINE PROGRAM**

**I. LIFELINE PROGRAM (Cont'd)**

**D. Lifeline Service Discounts**

2. Additional state reduction of \$3.50 in the monthly amount of intrastate charges due; and
3. Additional state-approved reduction equivalent to the Texas High Cost Universal Service Program Area Discount in P.U.C. Subst. Rule 26.412 of \$2.95 for Verizon SW or an amount as tariffed by the incumbent local exchange carrier serving the area of the qualifying low-income customer.
4. Additional state-approved reduction equivalent to the Texas Small and Rural ILEC Universal Service Program Area Discount in P.U.C. Subst. 26.412 of \$1.65 for Windstream/Kerrville or an amount as tariffed by a small incumbent local exchange carrier serving the area of the qualifying low-income customer in which the Company also provides service.

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**E. Service Charges**

1. Service charges do not apply when eligible customers with existing residential service convert to Lifeline Service.
2. Service charges apply when:
  - (a) At the time Lifeline Service billing is initiated, where existing eligible residential local exchange access service customers request additional features, such as special or custom calling features.
  - (b) A customer receiving Lifeline Service voluntarily elects to convert to telephone service arrangements, which preclude Lifeline Service eligibility.
  - (c) New residential applicants (those without existing service) eligible for the Lifeline Program will be subject to applicable service charges.

Issued: April 16, 2014

Mike Higgins  
P.O. Box 991  
San Angelo, Texas 76902

Effective: May 1, 2014

**Received**

Effective Date: 5-1-14  
Docket/TC/Proj. No.: 42242



**LIFELINE PROGRAM**

**I. LIFELINE PROGRAM (Cont'd)**

**E. Service Charges (cont'd)**

3. Any subsequent moves or changes after the initial connection to Lifeline Service will be subject to applicable service charges.
4. The Company waives monthly number portability charges for a Lifeline customer.
5. The Company may not disconnect Lifeline Service for nonpayment of toll charges.
6. A Lifeline customer is required to adhere to the same bill payment policies applicable to all of the Company's customers.

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**F. Number Portability Charge**

The Company waives the monthly number portability charge for a Lifeline customer.

**G. Payments and Disconnection of Service**

1. The Company may not disconnect Lifeline Service for nonpayment of toll charges.
2. A Lifeline customer is required to adhere to the same bill payment policies applicable to all of the Company's customers.

**II. Reserved for Future Use**

Issued: April 16, 2014

Mike Higgins  
P.O. Box 991  
San Angelo, Texas 76902

Effective: May 1, 2014

**Received**

Effective Date: 5-1-14  
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